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14	UNITED STATES DISTRICT COURT				
15	CENTRAL DISTRICT OF CALIFORNIA				
16	RUBEN JUAREZ, an individual and	Case No.: 2:17-cv-03342			
	ISELA HERNANDEZ, an individual				
17	D1-:-4:C6-	PLAINTIFFS' EVIDENCE WITH			
18	Plaintiffs, v.	TABLE OF CONTENTS IN SUPPORT OF PLAINTIFFS' OPPOSITION FOR			
19	· ·	MOTION FOR SUMMARY			
20		JUDGMENT			
21	PRECISION VALVE & AUTOMATION,	Datas October 1 2019			
	Inc., a corporation and DOES 1-20	Date: October 1, 2018 Time: 1:30 p.m.			
22	Defendants.	Ctrm: 5D, 5th Floor			
23		Judge: Hon. Otis D. Wright II			
24		*Disintiffs request are argument on this			
25		*Plaintiffs request oral argument on this motion for summary judgement.			

PLAINTIFFS' EVIDENCE WITH TABLE OF CONTENTS IN SUPPORT OF PLAINTIFFS' OPPOSITION FOR MOTION FOR SUMMARY JUDGMENT

## BALABAN & SPIELBERGER LLP 11999 SAN VICENTE BOULEVARD, SUITE 345 LOS ANGELES, CALIFORNIA 90049

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	<b>Declaration of Vanessa L. Loftus-Brewer</b>	
<b>EXHIBIT</b>	EVIDENCE	<b>TAB</b>
1	Deposition of Ruben Juarez Volume I taken on March 30, 2015	1
2	Deposition testimony of Ruben Juarez Volume II taken on May 20, 2015	2
3	Deposition testimony of Ruben Juarez Volume I taken on March 8, 2018	3
4	Deposition testimony of Ruben Juarez Volume II taken on March 15, 2018	4
5	Video of the PVA 350 at https://www.youtube.com/watch?v=w9UpClxLyRo published on August 16, 2012	5
6	Video of the PVA machine at https://vimeo.com/283053359 downloaded on August 16, 2018	6
7	Video of the PVA machine taken on May 6, 2010 at https://www.youtube.com/watch?v=CummunnqWVs	7
8	PVA Inc. coating Video downloaded on August 16, 2018	8
9	PVA Inc. video taken on April 11, 2012 during the PVA Inc. demonstration	9
10	Pertinent portion of the Arathane MSDS sheet re PVA Inc. Engineering Duty	10
11	Product sheet PVA bate stamp 280	11
12	Selective Coating Equipment Comparison chart PVA bate stamp number 0220	12
13	System Debug dated March 1, 2009 served as PVA bate stamp number PVA 0277	13

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1 2	14	Hawthorne Hazard Communication produced in discovery SPX002075, 2132	14
3	15	Operation and Maintenance Manual bate stamp PVA 69	15
3	16	Final Shipment Sign-Off, bate stamp number 272	16
5	17	Operations and Maintenance Manual, promotional material, and sales documents, bate stamp number 63, 64, 219, 220, 277, 279, 280	17
	18	Operation and Maintenance Manual, bate stamp number 40	18
7	19	PVA manual bate stamp number 30, 31, 32, and 51	19
8	20	Equipment Comparison Chart	20
9	21	Photographs produced by PVA Inc. bate stamp number 4540, 4539, 4538, and 4537	21
10 11 12 13	22	Documents produced by PVA Inc. in discovery including bate stamp numbers 4463-4481, 23-24, 302-317, 340-347, 1689-1690, 1695-1702, 1747-1749, 1775-1776, 1812-1817, 1684, 1689, 1690, 1691, 1698-1702, 1708, 1714-1719, 1820-1826, 2263, 2131, 2153, 2169, 2080, 2084, and 1680	22
14 15	23	Wet Film Thickness Gauge produced by PVA bate stamp number 1181	23
16 17	24	PVA Non-Disclosure Statements on or about May 3, 2018 and emails bate stamp numbers 1669-1670	24
18	25	Sales documents produced by PVA	25
	26	MSDS sheets produced by PVA	26
19 20	27	Emails, diagrams, and MSDS sheets produced by PVA Inc.	27
21	28	Exemplar Xylene sheet	28
22 23 24	29	Documents produced by PVA Inc. PVA 0063, 0064, 0069, 0220, 279-280, 383-390, 1657-1661, 1747-1749 [emails (with attachments), photographs, additional PVA Inc. documents related to the subject machine, portions of the Operation and Maintenance Manual, and the Selective Coating Equipment Comparison Chart]	29
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30 31 32 33 34	Discovery process on or about January 11, 2017 including PVA 2237-2239  Documents produced by PVA Inc. during the discovery process PVA 0030, 0031, 0032, 0040, 0041, 0051, which includes various sections of the electronic manual produced by PVA Inc. in the discovery process  Documents produced by PVA Inc. during the discovery process on or about January 11, 2017 PVA bate stamp number PVA 1883-1885, which includes emails between PVA Inc. employees titled a "Space X coating inspection."  pertinent emails produced by PVA Inc. in discovery on or about December 20, 2017  Documents produced by PVA Inc. including bate stamp numbers PVA 420-423, and 1183-1304 which includes PVA materials being ordered by Space X, ongoing Services, and design specifications	30 31 32 33 34
32	process PVA 0030, 0031, 0032, 0040, 0041, 0051, which includes various sections of the electronic manual produced by PVA Inc. in the discovery process  Documents produced by PVA Inc. during the discovery process on or about January 11, 2017 PVA bate stamp number PVA 1883-1885, which includes emails between PVA Inc. employees titled a "Space X coating inspection."  pertinent emails produced by PVA Inc. in discovery on or about December 20, 2017  Documents produced by PVA Inc. including bate stamp numbers PVA 420-423, and 1183-1304 which includes PVA materials being ordered by Space X, ongoing Services,	32
33	process on or about January 11, 2017 PVA bate stamp number PVA 1883-1885, which includes emails between PVA Inc. employees titled a "Space X coating inspection."  pertinent emails produced by PVA Inc. in discovery on or about December 20, 2017  Documents produced by PVA Inc. including bate stamp numbers PVA 420-423, and 1183-1304 which includes PVA materials being ordered by Space X, ongoing Services,	33
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34	numbers PVA 420-423, and 1183-1304 which includes PVA materials being ordered by Space X, ongoing Services,	34
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36	documents produced by PVA Inc. in discovery including bate stamp numbers PVA 1680-1685, 1725-1731, 1812-1817, 1827 served on or about December 20, 2017 as well as 4449-4452 served on or about December 28, 2017	36
37	the documents produced by Space X including SPC002075 and 2132	37
38	First Amended Complaint dated April 24, 2018	38
39	Plaintiffs' Initial Disclosures served on August 16, 2017 and Plaintiffs' Supplemental Disclosures served on July 10, 2018	39
40	Plaintiff Ruben Juarez's Response to Defendant's Request for Interrogatories, Set One, served on September 8, 2017	40
41	Plaintiff Isela Hernandez's Response to Defendant's Request for Interrogatories, Set One, served on September 8, 2017.	41

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2	42	Interrogatories to Plaintiff Isela Hernandez, Set One, served on July 17, 2017	42
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6	45	Complaint filed on February 28, 2017	45
7 8	46	Emails to Space X dated March 3, 2015 produced by PVA Inc.	46
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14	52	Declaration of Jose Vasquez	52
15	53	Deposition of Ruben Juarez Volume III	53
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DATED: SEPTEMBER 10, 2018 BALABAN & SPIELBERGER, LLP

/s/ Vanessa L. Loftus-Brewer Daniel K. Balaban, Esq. Andrew J. Spielberger, Esq. Vanessa L. Loftus-Brewer Attorneys for Plaintiff

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